



REC'D TN
MAR 21 1997
'97 MAR 21 PM 3 27
Carolina Telephone
Centel-North Carolina
Centel-Virginia
United Telephone-Southeast

James B. Wright
Senior Attorney

EXECUTIVE SECRETARY

March 20, 1997

Ms. Martha P. McMillin
MCI Dept. Loc Code 0347/943
780 Johnson Ferry Road, Sta. 700
Atlanta, GA 30342

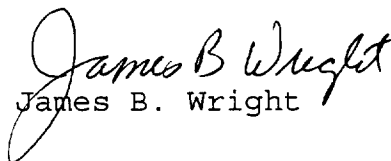
RE: TRA Docket No. 96-01235

Dear Martha:

Per our discussion, I represent that the enclosed is a copy of the current Business Office procedures of United Telephone-Southeast, Inc. for implementation of toll dialing parity (1+ intraLATA presubscription) in Tennessee.

The enclosed represents current policy under existing law. United specifically reserves the right to change these procedures so long as they remain in compliance with the law.

Sincerely yours,


James B. Wright

JBW:er

Enclosure

CC: David Waddell ✓

#10152

1 + INTRALATA PRESUBSCRIPTION DOCUMENTATION

1. GENERAL INFORMATION - The FCC has ordered that toll dialing parity be made available no later than August 8, 1997.
2. WHAT DOES 1+ INTRALATA MEAN TO THE CUSTOMER -
IntraLATA Toll Dialing Parity allows the end-user customer the ability to select a carrier of choice for intralata toll calls similar to interlata equal access. The Intralata carrier can be an Interexchange carrier (existing interlata carriers) or the local telephone company.

The customer may subscribe to their LEC, their current IXC, or other participating carriers to carry their intralata toll. Intralata toll may be referred to as local toll or local long-distance.

As we can understand, customers are confused. They neither understand nor care about; intra/interlata, intra/interstate, local/local toll, etc. so our biggest hurdle will be to help the customer understand what is intralata. (See Par. 4)

This requires that we as the LEC, be able to accept, process and maintain the same type of carrier /IXC information regarding the customers selection of an intralata carrier as we do for the interlata carrier.

There will NOT be any balloting process for existing customers to select an intralata PIC. All existing customers will automatically be defaulted to 0000 PIC, which is the Local Company and we will continue to carry and bill their intralata calls unless or until the customer requests to change to another Intralata IXC.

We expect that once the market is opened, other carriers will began marketing heavily as they did with equal access. As the Local Company, we will comply with requests for a PIC change.

3. RULES - The current rules for discussing long-distance carriers must be followed when discussing intralata toll.

3.01 Don't provide information about a particular carriers' services, rates or other information which could influence customer's choice.

3.02 Don't express preference for one carrier over another.

4. TALKING WITH THE CUSTOMER - Service Order Inquiry

4.01 New Connect - First discuss selecting a long-distance carrier as you do today, then proceed with --

"Mr./Mrs. Customer due to recent changes you now also need to select a carrier for your Intralata or local tolls. Do you know what carrier you want for your local toll calling area which is outside your current local and EAS calling scope?"

If customer does not know or asks assistance in selecting then proceed to explain ---

"The interlata long-distance equal access process allowed you to choose a long-distance company to process 1+ calls outside your local service area. These calls go beyond the lata and, often beyond the long-distance area code served by your local telephone company.

Expanding to intralata allows you to designate a long-distance company to handle 1+ calls that are within your LATA, but outside your local service area/calling scope. These calls will be billed rates determined by the company you select."

(We don't have access to the rates, they must be discussed directly with the carriers).

Should you need the definition of LATA ----

A LATA is officially known as a Local Access and Transport Area. LATAs were established to create a geographic boundary between Regional Bell Operating Companies and long-distance companies. The idea was to create a boundary system that encouraged as much competition as possible for long-distance service and allowed competitors equal access into markets.

INTRALATA means that the long-distance service (local toll) originates and terminates within the boundaries of a single LATA. Our company, as an exchange carrier, is allowed to provide long-distance service only within LATA boundaries.

INTERLATA means that the long-distance service originates in one LATA and terminates in another. This is provided by an inter-exchange carrier.

- a. If the customer provides the carrier name or IXC then proceed with your order entries.
- b. If the customer does not know who he wants then offer to read the list of available carriers for intralata again. This list is in the on-line handbook.
- c. Every attempt should be made to get the customer to choose a carrier on their own. If the customer does not make a selection; explain that "no-pic" will mean they are unable to complete intralata toll calls without dialing a carrier code.
- d. We will need to refer the customer to his selected Intralata carrier on a new account, if he selects one different than his Interlata carrier and other than the local company.

- 4.02 Move Order or Adding Lines - Whatever verbiage works for you today when a customer places a move order or adds lines when you discuss Interlata PIC, should also be used to discuss Intralata PIC.

5. TALKING WITH THE CUSTOMER - Other inquiries

- 5.01** If an existing customer calls in with another type of contact and the customer conversation turns to intralata or the call is a generic inquiry about intralata/local toll, the following guidelines will apply.
- a.** Make a generic explanation that the customer has a choice of who will carry their calls to nearby communities outside of their EAS and local calling scope.
 - b.** Explain that we as the local company, currently carry those calls and bill for them.
 - c.** Offer the explanation of intralata, LATAs, etc. in above Paragraph 4.

1 + INTRALATA QUESTIONS AND ANSWERS

Q. What is 1+ Presubscription?

A. The customer may now select who carries their IntraLATA (referred to as local toll or local long-distance) calls. The customer is allowed to have one carrier for their IntraLATA calls and another for their long-distance calls. The process is similar to a customer choosing a long distance carrier.

Q. Why is 1+ Presubscription necessary?

A. The FCC mandated that the local telephone companies would open their markets to competition no later than 8/8/97.

Q. What is a LATA?/How is Local Toll different from long-distance?

A. A LATA (Local Access Transport Area) is a geographic area established for the provision and administration of communication service, in which local exchange carriers are allowed to provide long distance service. Also see Par. 4 for additional description.

IntraLATA means that the long-distance service originates and terminates within the boundaries of a single LATA. Examples of intraLATA calls would be call from _____ to _____.

Q. How do I explain intraLATA to my customer?

A. IntraLATA calls are those placed beyond your EAS and local calling scope, but are still within the local LATA. These calls are not a part of your local service rate, but are carried by your local company (us) and billed on your bill as "United Telephone" long-distance. Refer to your current LATA map.

Q. How will this affect the customer's bill?/Where will the charges appear on the bill?

A. If United continues to handle the customer's intraLATA calls, the associated charges will continue to appear on the local portion of the customer bill, under the heading of "United Telephone" long distance. If the customer switches his intraLATA PIC to another carrier, charges for IntraLATA calls will appear on the separate carrier bill, unless we currently bill on behalf of the carrier.

Q. Why are there two choices?/Why not just have one carrier?

A. The customer is allowed to have a separate carrier for local toll and long-distance for the following:

To allow the customer more options and opportunities to customize their service and to subscribe to the right plan for their particular needs.

To allow the incumbent LEC to continue to offer local toll service to their customers.

Q. My friend has a choice for local toll, why don't I?

A. As each central office is converted to 1+ Presubscription, in accordance with the attached schedule, more and more customers will be able to choose who carries their local toll calls.

Q. Is the customer being notified? How?

A. Bill messages in advance of cutover.